

§ 103 as allegedly being anticipated by Applicants' disclosure in the Background section of the specification ("AAPA") in view of Ueda U.S. Patent 6,399,518 ("Ueda").

Applicants have amended claim 4 to include the feature of claim 5, and Applicants respectfully submit that the claims 4 and 6-7 as now presented are patentable over the AAPA in view of Ueda for at least the following reasons.

In paragraph 4, on page 3, discussing the rejection of claim 4, the Office Action states mentions that:

*"As to claim 1 which recites that the "clean air flows downward over the first and second semiconductor process units to carry the process deteriorating gas away from the second process unit, the AAPA does not explicitly teach this limitation."*

However, Applicants respectfully submit that: it is claim 4, not claim 1, that has been rejected in paragraph 4 of the Office Action; and (2) claim 4 does not and never did include any limitation that *"clean air flows downward over the first and second semiconductor process units"* - either prior to or after this Amendment of claim 4.

**Therefore, it is irrelevant whether Ueda discloses such a feature - since such a feature is not and never has been a limitation of claim 4.**

Instead, as now amended, claim 4 includes, among other things, features wherein an adhesion unit is installed at a first position and a bake unit is installed at a

second position, such that clean air flows from the second position (where the bake unit is installed) to the first position (where the adhesion unit is installed) to carry a process deteriorating gas generated by the adhesion unit (at the first position) away from the bake unit.

The AAPA does not disclose such a feature. Applicants respectfully submit that Ueda does not disclose such a feature either in the cited FIG. 4 or in the cited text at col. 2, line 15 to col. 4, line 58. Indeed, Applicants submit that neither FIG. 4, nor the cited text, make any mention of either a bake unit or an adhesion unit, or any airflow relationship between such units. FIG. 4 merely shows an arrangement of devices where air flows downwardly. This is not what Applicants have claimed in claim 4.

Applicants' specification clearly discloses specific benefits of carrying a process deteriorating gas, generated by the adhesion unit, away from the bake unit. No such benefits are disclosed or suggested by Ueda, which instead is concerned mainly with the entry of impurities into the entirety of the resist coating and developing processing apparatus from the clean room itself (see, e.g., col. 2, lines 17-22, 57-63).

Therefore, Applicants respectfully submit that the device of claim 4 is patentable over any combination of the cited art.

For at least the foregoing reasons, Applicants respectfully submit that the device of claim 4 is patentable over the AAPA and Ueda. Claims 6-7, dependent

from claim 4, are deemed allowable for similar reasons. Withdrawal of the rejection of claims 4 and 6-7 under 35 U.S.C. § 103 is respectfully requested.

### CONCLUSION

In view of the foregoing explanations, Applicants respectfully request that the Examiner reconsider and reexamine the present application, allow claims 1, 3-4 and 6-12, and pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (703) 715-0870 to discuss these matters.


If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 50-0238 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17, particularly extension of time fees.

Respectfully submitted,

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By: \_\_\_\_\_

  
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**Version with Markings to Show Changes Made**

**In the Claims:**

Claim 5 has been canceled without prejudice or disclaimer.

Claim 4 has been amended as follows:

4. (Amended) A semiconductor fabricating device, comprising:

[a first semiconductor process] an adhesion unit installed in a production line, the adhesion unit having an adhesion chamber that supplies an adhesion enhancing material that reinforces adhesion between a wafer and a photoresist layer when the photoresist layer is deposited onto the wafer [that performs first semiconductor fabricating processes] and that generates a process deteriorating gas [during the first semiconductor fabricating processes]; and

a [second semiconductor process] bake unit installed in the production line, the bake unit being adapted to bake the wafer having the photoresist layer formed thereon, the [second semiconductor fabricating processes] baking being susceptible to operational failures if exposed to the process deteriorating gas,

wherein the [first semiconductor process] adhesion unit is installed [in] at a first position and the [second semiconductor process] bake unit is installed at a second position, and

wherein clean air flows from the second position where the bake unit is installed to the first position where the adhesion unit is installed, to carry the process deteriorating gas away from the [second semiconductor process] bake unit.